

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**FOURTH SUPPLEMENTAL DECLARATION OF EDGAR W. MOSLEY II IN SUPPORT OF
DEBTORS' APPLICATION TO EMPLOY AND RETAIN ALVAREZ & MARSAL NORTH
AMERICA, LLC AS FINANCIAL ADVISORS TO THE DEBTORS AND DEBTORS IN
POSSESSION PURSUANT TO SECTIONS 327(A) AND 328
OF THE BANKRUPTCY CODE NUNC PRO TUNC TO THE PETITION DATE**

Edgar W. Mosley II, being duly sworn, hereby states as follows:

1. I am a Managing Director with Alvarez & Marsal North America, LLC (together with employees of its affiliates (all of which are wholly-owned by its parent company and employees), its wholly owned subsidiaries, and independent contractors, "A&M"), a restructuring advisory services firm with numerous offices throughout the country. I submit this declaration (this "Fourth Supplemental Declaration") to supplement my prior declarations that have been submitted in connection with A&M's retention in these chapter 11 cases. Except as otherwise noted,² I have personal knowledge of the matters set forth herein.

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at A&M and are based on information provided by them.

2. On November 11, 2022 and November 14, 2022 (as applicable, the “Petition Date”),³ FTX Trading Ltd. and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) commenced these cases by filing voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Court”).

3. On December 21, 2022, the Debtors filed the *Application for an Order Authorizing the Retention and Employment of Alvarez & Marsal North America, LLC as Financial Advisors to the Debtors and Debtors in Possession Pursuant to Sections 327(a) and 328 of the Bankruptcy Code Nunc Pro Tunc to the Petition Date* (the “Application”) and attached thereto was my declaration of support of the Application (the “Original Declaration”).

4. On January 19, 2023, the Debtors filed the *First Supplemental Declaration of Edgar W. Mosley II in Support of Debtors' Application to Employ and Retain Alvarez & Marsal North America, LLC as Financial Advisors to Debtors and Debtors in Possession Pursuant to Sections 327(a) and 328 of the Bankruptcy Code Nunc Pro Tunc to the Petition Date (related document(s) 528, 534, 1698) Filed by FTX Trading Ltd.* (the “First Supplemental Declaration”).

5. On January 19, 2023, the Court entered the *Order Authorizing the Retention and Employment of Alvarez & Marsal North America, LLC as Financial Advisors to the Debtors and Debtors in Possession Pursuant to Sections 327(a) and 328 of the Bankruptcy Code Nunc Pro Tunc to the Petition Date*.

6. On June 23, 2023, the Debtors filed the *Second Supplemental Declaration of Edgar W. Mosley II in Support of Debtors' Application to Employ and Retain Alvarez & Marsal North America, LLC as Financial Advisors to Debtors and Debtors in Possession Pursuant to Sections 327(a)*

³ November 11, 2022 is the Petition Date for all Debtors, except for Debtor West Realm Shires Inc.

and 328 of the Bankruptcy Code Nunc Pro Tunc to the Petition Date (related document(s) 528, 534, 1698) Filed by FTX Trading Ltd. (the “Second Supplemental Declaration”).

7. On December 28, 2023, the Debtors filed the *Third Supplemental Declaration of Edgar W. Mosley II in Support of Debtors' Application to Employ and Retain Alvarez & Marsal North America, LLC as Financial Advisors to Debtors and Debtors in Possession Pursuant to Sections 327(a) and 328 of the Bankruptcy Code Nunc Pro Tunc to the Petition Date (related document(s) 528, 534, 1698) Filed by FTX Trading Ltd. (the “Third Supplemental Declaration” and together with the First and Second Supplemental Declarations and the Original Declaration, the “Prior Declarations”).*

8. I submit this Fourth Supplemental Declaration to disclose certain additional information since the filing of the Prior Declarations. Capitalized terms used herein and not otherwise defined have their respective meanings set forth in the Prior Declarations.

9. In the First Supplemental Declaration, A&M disclosed that it was providing personnel to provide service to Genesis and Celsius in their Chapter 11 cases and informed the Court that (i) Celsius was a creditor in the Debtors' Chapter 11 cases and vice versa and (ii) that Genesis was a member of the Unsecured Creditors Committee in the Debtors' Chapter 11 cases and that the Debtors filed claims in Genesis' Chapter 11 cases. A&M instituted information barriers between the A&M personnel providing services to Celsius and Genesis on the one hand and the A&M personnel providing services to the Debtors, on the other hand.

10. At this time, the claims and disputes between the Debtors and Genesis have been fully resolved via settlement and A&M has removed the information barrier that was set up between the A&M personnel providing services to Genesis and the A&M personnel providing services to the Debtors.

11. Celsius' *Modified Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and its Debtor Affiliates* (the "Celsius Plan") became effective on January 31, 2024. A&M's work for Celsius post-effective date does not include services in connection with any potential claims against the Debtors other than to respond to requests for customer transaction data that is handled by A&M on behalf of Celsius. A&M has recused itself in both matters from any disputes or litigation that may arise between Celsius and the Debtors. A&M has removed the information barrier that was set up between the A&M personnel providing services to Celsius and the A&M personnel providing services to the Debtors.

12. In addition, A&M's affiliate has been engaged to provide corporate tax consulting services to Potential Party in Interest Switchboard. Those services are unrelated to the Debtors and these Chapter 11 cases.

13. To the extent any information disclosed herein requires amendment or modification upon A&M's completion of further review or as additional party-in-interest information becomes available to it, a further supplemental declaration reflecting such amended or modified information will be submitted to the Court.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct.

Dated this 18th day of March 2024

By: Edgar W. Mosley II
Edgar W. Mosley II
Managing Director